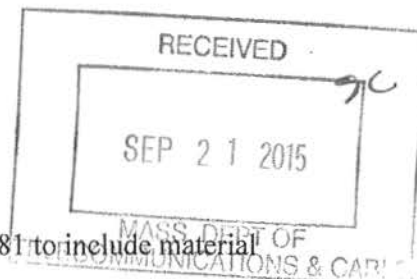




415 Hepplewhite Dr.  
Johns Creek, GA 30022  
770-649-1886 / fax 770-645-6545  
[www.bodamer.com](http://www.bodamer.com)

September 16, 2015

Sara Clark, Secretary  
Massachusetts Department of Telecommunications and Cable  
1000 Washington Street, 8<sup>th</sup> Floor, Suite 820  
Boston, MA 02118-6500



RE: Revision of Richmond Telephone Company FCC Form 481 to include material  
under § 54.313(f)

Dear Secretary Clark:

Richmond Telephone was recently contact by Kerri DeYoung regarding the company's 2015 FCC Form 481 filing. She noted that the company inadvertently omitted material found on Lines 3010-3012 and requested that we augment the filing to include the omitted material.

USAC currently has the 481 closed from revisions pending the completion of their own review of all filers' forms. Their representative further indicated that missing Lines 3010-3012 was a common error amongst filers who did not recognize that those lines included material newly required this year.

The omitted material is included here as 110037MA3010 and 110037MA3012. Line 3011 should have been checked as acknowledged.

Upon notice that USAC has completed its review and requires revisions Richmond Telephone will revised its 481 to address any identified deficiencies and will resubmit its filing material to the DTC at that time.

Any questions regarding this filing should be addressed to me at 770-649-1886 or email at [Eileen@Bodamer.com](mailto:Eileen@Bodamer.com).

Sincerely,

Eileen Bodamer, Consultant to Richmond Telephone Company

Enc.

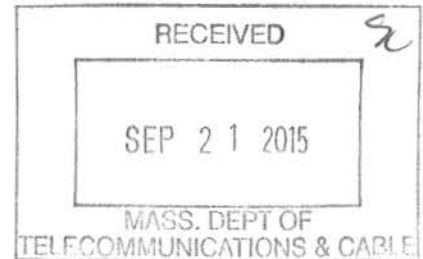
Cc: Rick Drake, Richmond Telephone Company, via email  
Kerri DeYoung, via email and US Mail



415 Hepplewhite Dr.  
Johns Creek, GA 30022  
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September 16, 2015

Sara Clark, Secretary  
Massachusetts Department of Telecommunications and Cable  
1000 Washington Street, 8<sup>th</sup> Floor, Suite 820  
Boston, MA 02118-6500



RE: Compliance Submission of Richmond Telephone Company Rate Floor Filing

Dear Secretary Clark:

Under CFR 47 U.S.C. § 254(b)(3), eligible telecommunications carriers that fail to meet the then-current residential local rate floor risk a dollar-for-dollar loss of federal high cost loop support equal to the difference between the rate floor and the company's actual local service rate.

The rate floor certification is made to USAC either directly by the telephone company or through its participation in the NECA tariff. Richmond Telephone is below the current rate floor however as per directives from NECA on the attached rate floor certification, the company is not a HCL recipient and simply indicated as such.

Any questions regarding this filing should be addressed to me at 770-649-1886 or email at [Eileen@Bodamer.com](mailto:Eileen@Bodamer.com).

Sincerely,

Eileen Bodamer, Consultant to Richmond Telephone Company

Enc.

Cc: Rick Drake, Richmond Telephone Company, via email  
Kerri DeYoung, via email and US Mail

Christopher Bean  
Senior Consultant  
Regulatory Massachusetts/Rhode Island



125 High Street, Floor 7  
Boston, MA 02110

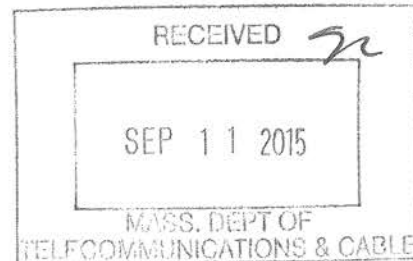
Phone 617 743-8878  
Fax 617 743-8881

September 10, 2015

Sara Clark, Secretary  
Department of Telecommunications and Cable  
Commonwealth of Massachusetts  
1000 Washington Street, Suite 820  
Boston, MA 02118

Re: Form 481 Supplemental filing

Dear Secretary Clark,



At the request of the Department, enclosed for filing is information supplemental to Verizon Massachusetts' FCC Form 481, which was originally filed on July 1, 2015. Included in this filing are the following;

1. Massachusetts Supplement to FCC Form 481, regarding service quality, consumer protection, emergency situations and Lifeline;
2. Functionality in Emergency Situations, Attachment 115112ma610; and
3. Voice Services Rate Comparability Certification, Attachment 115112ma1010.

The Department also asked for Verizon MA's federal Rate Floor Data Report and Certification. Verizon MA does not file this form because we do not receive the type of federal support affected by the sub-floor funding limitations in §54.318 of the FCC's rules. That rule applies to "high cost support," which it defines in sub-section (d) as "the support available pursuant to § 36.632 of this chapter and frozen high-cost support provided to price cap carriers to the extent it is based on support previously provided pursuant to § 36.631 or § 54.309 of this chapter." Verizon MA did not receive support in Massachusetts under § 36.361 (which is the "high cost loop" program) or under § 54.309 (which is the "high cost model" program). The frozen high-cost support Verizon MA receives in Massachusetts is based on support previously

provided under a different program, the "Interstate Access Support" (IAS) program, formerly in §§ 54.800-54.808 of the rules.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to be "J. R.", written in a cursive style.

Senior Consultant – Regulatory – MA/RI

Enclosures

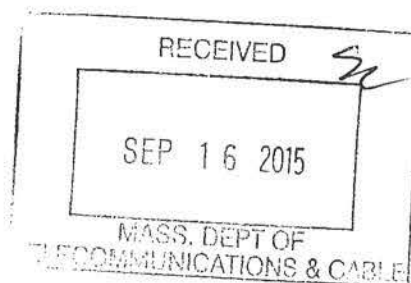
cc: Kerri DeYoung Phillips, Esq.





OTTcommunications

September 11, 2015



**Via U.S. Mail & Email**

Kerri DeYoung Phillips, Counsel II  
Massachusetts Dept. of Telecommunications and Cable  
1000 Washington Street, Suite 820  
Boston, MA 02118-6500

**Re: Granby Telephone LLC d/b/a OTT Communications  
Rate Floor Certification**

Dear Ms. Phillips:

Granby Telephone LLC d/b/a OTT Communications ("OTT") did not receive High Cost Loop Support and therefore did not file a Rate Floor Certification. Enclosed please find the Rate Floor Data Collection received from USAC, which indicates that no support was received.

If you have any questions, I may be reached at (207) 992-9920 or by email at [trina.bragdon@ottcommunications.com](mailto:trina.bragdon@ottcommunications.com).

Sincerely,

Trina M. Bragdon  
General Counsel  
OTT Communications

OTT communications  
900D Hammond Street  
Bangor, Maine 04401